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February 3, 2022

**By ECF**

Hon. Kimba M. Wood  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Gil et al as to Elizabeth Araujo**  
**20 Cr 199 (KMW)**

Dear Judge Wood:

I represent Elizabeth Araujo in the above-captioned matter and I write requesting that the Court amend her conditions of bail and allow her to travel to the Dominican Republic from March 1 to March 15, 2022.

*kmw*  
 [Granted]

I have spoken with AUSA Kedar Bhatia and the Government “defers to Pre-trial.” I have communicated with Pre-trial Services Officer Dominique Jackson and Pre-trial “has no position as long as approval is given from the Court.” Accordingly, I respectfully request that the Court approve this temporary bail modification and allow Ms. Araujo to go to the Dominican Republic. If approved, she will provide Pre-trial with her flight information as well as the location of where she will be staying in the Dominican Republic.

I also write to advise the Court that the purpose of this trip is for Ms. Araujo to try to make arrangements to sell certain real estate in which she has limited equity so that she can voluntarily use this money towards restitution. When Ms. Araujo completed the financial affidavit and was appointed CJA counsel, she did not realize that she was obligated to disclose her limited interest in two apartments that are situated in the Dominican Republic. I have spoken with AUSA Bhatia and advised him of this updated financial information and how it relates to the purpose of Ms. Araujo’s travel request.

Accordingly, if the foregoing bail modification request meets with the Court's approval, then we respectfully request that the Court "So Order" this letter granting the application.

Respectfully,



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Cc; all parties (by ECF)

**SO ORDERED: N.Y., N.Y.**



2/7/22

Kimba M. Wood  
KIMBA M. WOOD  
U.S.D.J.